

1 Steven S. Kane, Esq., SBN: 061670
Bonnie E. Kane, Esq., SBN: 167700
2 **THE KANE LAW FIRM**
402 W. Broadway, Suite 2600
3 San Diego, CA 92101
Telephone: (619) 236-8700
4 Facsimile: (619)236-1370
E-mail: skane@thekanelawfirm.com
5 E-mail: bonnie@thekanelawfirm.com

6 Attorneys for John Venn and Kandi Venn

7 **UNITED STATES BANKRUPTCY COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**

10 *In re:*

11 PG&E CORPORATION

12 -and-

13 PACIFIC GAS AND ELECTRIC
14 COMPANY

Debtors.

15 ☐ Affects PG&E Corporation

16 ☐ Affects Pacific Gas & Electric

17 ☒ Affects Both Debtors

18 *All papers shall be filed in the Lead Case,*
19 *No.19-30088 (DM)*

) **Case No. 19-30088 (DM)**
)
) Chapter 11
) (Lead Case)
) (Jointly Administered)
)
) **DECLARATION OF JOHN VENN IN**
) **SUPPORT OF MOTION PURSUANT TO**
) **FEDERAL RULE OF BANKRUPTCY**
) **PROCEDURE 9006(b)(1) TO DEEM**
) **CLAIM TIMELY FILED**
)
) Date: March 29, 2022
) Time: 10:00 a.m.
) Place: **To Be Held Telephonically**
) United States Bankruptcy Court
) Courtroom 17
) 450 Golden Gate Avenue, 16th Floor
) San Francisco, CA
) Judge: Honorable Dennis Montali

20
21 **Objection Deadline: March 22, 2022**

22 I, John Venn, hereby declare and state as follows:

23 1. This declaration is based upon my personal knowledge unless otherwise indicated. If
24 called upon to testify as to the matters stated herein, I could and would competently do so.

25 2. On the day of the Camp Fire I was living at 14752 Briarwood Dr., Magalia, California
26 95954 with my wife, Kandi Venn.

27 3. Due to the fast approaching fire my wife and I loaded up our three dogs and evacuated
28 to Chico.


4. My wife Kandi Venn, attempted to submit a claim for us on Prime Clerk prior to the claim submission of February 26, 2021. The Prime Clerk had no record of our submission. I believed we were no longer eligible to file a claim against PG&E because their submission was not in the system.

5. I recently found out that I could request the Bankruptcy court to allow me to file a late claim for my emotional distress sustained in the fire.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed at Magalia, California, on February²⁴ __, 2022.

- DocuSigned by:

DocuSigned by:

 21BD199821C240A

-21BD189831C240A

John Venn